

Juan C. Chavez, OSB #136428
Franz H. Bruggemeier, OSB #163533
Oregon Justice Resource Center
PO Box 5248
Portland, OR 97208
Telephone: 503-944-2270
Facsimile: 971-275-1839

Attorney for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION

MARK WILSON

Plaintiffs,

v.

JERRY PLANTE, RONNIE FOSS, CRAIG
PRINS, JOSH HIGHBERGER, and
JOHN DOES 1-10.

Defendants.

Case No. 6:21-cv-01606-SI

DECLARATION OF COUNSEL

I, Juan C. Chavez, submit the following declaration:

I am the counsel of record for the Plaintiff, Mark Wilson, and I make this declaration in support of Plaintiff's Motion for Extension of Case Deadlines. My statements are true to the best of my own knowledge, except as to those matters which are therein alleged on information and belief, and as to those matters, I believe them to be true.

1. Since the parties' last request for extension of case deadlines, we have performed additional paper discovery and conferred on discovery issues present in the case. Some of the discovery issues were resolved, and others will likely require further conferral or the

DECLARATION OF COUNSEL

Court's assistance.

2. Additionally, since the last request for extension of time, one of the defendants, Colette Peters, became the Director of the Bureau of Prisons, necessitating a move to Washington, D.C. The parties are working diligently on establishing a deposition schedule mutually agreeable to all parties.
3. I have conferred with the Counsel for Defendants, Nathan Riemersma, regarding this motion, and informed me that the defendants do not oppose the relief requested by this motion. The parties will work diligently to conclude this case as expeditiously as possible.

I hereby declare that above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: September 29, 2022.

/s/ Juan C. Chavez
Juan C. Chavez, OSB #136428
PO Box 5248
Portland, OR 97208